

IN THE UNITED STATES COURT
FOR THE DISTRICT OF DELAWARE

IPLEARN, LLC,

Plaintiff,

v.

ORACLE CORPORATION, et al.,

Defendants.

C.A. No. 11-825-RGA

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR AN ORDER AUTHORIZING DEPOSITIONS IN THE
REPUBLIC OF INDIA AND EXECUTION OF LETTERS OF REQUEST FOR
INTERNATIONAL JUDICIAL ASSISTANCE**

Plaintiff IpLearn, LLC (“IpLearn”) hereby moves for an order by the Court authorizing IpLearn to conduct depositions of Defendant Oracle Corporation (“Oracle”) and Oracle’s employees pursuant to Rules 30(b)(1) and 30(b)(6) of the Federal Rules of Civil Procedure in the Republic of India.

Oracle has identified the witnesses as Vidya Nagaraj, Tariq Fazal, Dayanand Patangey, and Prem Arumugam and has agreed to make them available to sit for depositions in the Republic of India. IpLearn respectfully requests that Court execute and affix its seal to the Requests for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters for each witness, attached hereto as Exhibits 1, 2, 3 and 4.

Oracle does not oppose this motion.

January 17, 2014

Respectfully submitted,

CONNOLLY GALLAGHER LLP

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